



March 5, 2019

Ex Parte

Ms. Marlene Dortch
Secretary
Federal Communications Commission
445 12th Street, SW
Washington, D.C. 20554

Re: USTelecom Ex Parte Notice Connect America Fund, WC Docket No. 10-90

Dear Ms. Dortch:

On Thursday, February 28, 2019, Alan Buzacott (Verizon), AJ Burton (Frontier), Jeffrey Lanning (CenturyLink), Mary Henze (AT&T), Steven Coran (WISPA), Mike Jacobs (ITTA), and the undersigned met with Sue McNeil, Suzanne Yelen, Stephen Wang of the Wireline Competition Bureau (Bureau), and Alec MacDonell, Rodger Woock, and Cathy Zima of the Office of Economics and Analytics (OEA) of the Federal Communications Commission (Commission) to discuss various issues relating to compliance obligations for recipients of Connect America Fund (CAF) support providing broadband service to fixed locations.

During the meeting, we discussed with Bureau and OEA staff issues consistent with the joint Petition for Reconsideration and Clarification filed in this proceeding by USTelecom, ITTA and WISPA.¹ We also discussed the Commission's current market-based approach to on-net testing for eligible telecommunications carriers (ETCs) that requires them to test to an access point located in various "FCC-designated metropolitan area[s]".² The group expressed concern that the designated market-based approach is too rigid to reflect the reality of the rapid changing marketplace. A criteria-based definition of an appropriate access point would better accommodate different sizes and types of ETCs as well as market evolution.

Pursuant to Commission rules, please include this ex parte letter in the above identified proceeding.

Sincerely,

A handwritten signature in blue ink, appearing to read "Kevin G. Rupy", with a stylized flourish at the end.

Kevin G. Rupy
Vice President, Law & Policy

¹ Petition for Reconsideration and Clarification, USTelecom, ITTA, the Wireless Internet Service Providers Association, WC Docket No. 10-90 (September 19, 2018).

² *Connect America Fund*, Order, 83 Fed. Reg. 42052, DA 18-710 (rel. July 6, 2018) (Order).

cc: Sue McNeil
Suzanne Yelen
Alec MacDonell
Rodger Woock
Cathy Zima
Stephen Wang